

I was hoping that I didn't have to look in front of everybody and face the back. My name is Sean Callahan. \_\_\_\_\_. I represent myself or private citizen. And I have a few comments on the industrial stormwater permit – about six or seven points. I'll make them pretty quick here. First one, how does Ecology expect to protect water quality when the Department is giving industrial stormwater permittees an automatic 300 foot mixing zone with the ability to expand the mixing zone? Subsection 6 of the WAC 173-201A-100 requires that the size of the mixing zone be minimized and minimized is the keyword here. I may suggest through this hearing providing a little bit of balance between environmental and business concerns, may be we could make that mixing zone 100 feet. Next issue is the five-year blanket exclusion for facilities, no exposure certification, excuse me. I feel the Department should require facilities to notify Ecology at least every six months to a year with some sort of certification, may be, perhaps, a report or check off box which has the signature of the CEO, owner, or chief financial officer. I think it's very important that these facilities are, or congenially remind themselves that they have a certification. They have to adhere to the no exposure clause within the permit. Also I would like to see language in the permit in the no exposure section that includes something about proper cover and containment of all liquid products and wastes. Next issue, I have and I'll quote these \_\_\_\_\_ sections, it's Section S9, #5B, all facilities should comply with future additions of the Puget Sound Stormwater Manual. Actually that's my verbiage. I feel that there should not be a "grandfather clause" for existing facilities. Many times, a gentleman previously mentioned, that industrial activities change, situations change, and we need to keep the SWPPP up-to-date with that. Also I would like to see on Page 34 the permit, excuse me, I'm sorry that was Page 30 where it talks about compliance with standards, Special Condition 7, Section C, stormwater treatment system that does not fully function during storm that exceeds the water quality design will not be a permit violation. I would appreciate it if that last sentence could be removed from the permit. That would severely restrict Ecology's ability to enforce on facilities that aren't applying proper BMPs and AKART. I don't want that to be a get out of jail free card essentially. And I think that's about it. Thanks for your time.